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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 EDWARD B. DOUGLAS, an individual,

14 Plaintiff,

15 v.

16 DREAMDEALERS USA, LLC d/b/a Exotics
17 Racing, a Nevada limited liability company,
18 DAVID PERISSET, an individual, and
19 ROMAIN THIEVIN, an individual,

20 Defendants.

21 Case No. 2:17-cv-02134-APG-BNW

22 **STIPULATION AND PROPOSED
23 ORDER TO EXTEND TIME TO
24 RESPOND TO MOTION TO RE-OPEN
25 DISCOVERY [ECF No. 51]**

26 **(First Request)**

27 Plaintiff, EDWARD B. DOUGLAS (“Plaintiff”), and Defendants, DREAMDEALERS
28 USA, LLC, DAVID PERISSET, and ROMAN THIEVIN (collectively “Defendants”), hereby
agree and stipulate to extend by two days the time for Plaintiff to respond to Defendants’ Motion
to Re-open Discovery, ECF No. 51, from the current deadline of January 21, 2020 up to and
including January 23, 2020. This is the first request to extend the time for Plaintiff to respond to
Defendants’ Motion to Re-open Discovery, which was filed on January 7, 2020.

29 Good cause exists to grant this stipulation and extend the response deadline by two days.
30 In particular, Plaintiff has been out of state attending medical appointments with his wife as she
31 seeks treatment related to breast cancer and a traumatic brain injury. Plaintiff has also been out of
32 state taking care of an elderly family member facing significant medical issues and requiring end-

1 of-life care. Accordingly, the requested extension is sought in good faith and not for purposes of
2 undue delay.

3 DATED: January 21, 2020

4 Respectfully submitted,

5 CLARK LAW COUNSEL PLLC

6 /s/ Dustin L. Clark

7 Dustin L. Clark
Attorney for Plaintiff

1 DATED: January 21, 2020

2 Respectfully submitted,

3 LITTLER MENDELSON, P.C.

4 /s/ Marcus B. Smith

5 Wendy M. Krincek
Marcus B. Smith
Attorney for Defendants

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11 IT IS SO ORDERED.

12
13 
14 UNITED STATES MAGISTRATE JUDGE

15 1/22/2020

16 DATED: _____